

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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AMERICAN GENERAL LIFE INSURANCE COMPANY,

Plaintiff,

-against-

TELLER FAMILY IRREVOCABLE TRUST VI,
by and through its trustee, GERSON SONTAG a/k/a
GERSHON SONTAG, and TELLER FAMILY
IRREVOCABLE TRUST VII, by and through its trustee,
BEZALEL BERNSTEIN a/k/a BTALEL BERNSTEIN,

Defendants.
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Case No.
2:10-CV-05604-SDW-MCA

AFFIDAVIT

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

DAVID WEBER, being duly sworn, deposes and says:

I am a resident of the State of New York and reside in Monroe, New York. I am a licensed insurance agent in the State of New York. I am not licensed to sell insurance in the State of New Jersey.

I became aware that Yoel Epstein had obtained an insurance policy on the life of Bluma Teller, as an agent for AIG, and was seeking investors to help pay the premiums on the policy. It was my understanding that American General Life Insurance Company was a subsidiary of AIG. I did not know at the time that American General was not licensed to sell insurance in New York, as I am now informed. Had I known that, I would not have become involved in an American General policy in New York on the life of a New York State resident to a New York trust.

I had heard in the community that Gershon Sontag was seeking to invest as an investor in life insurance policies. This was quite common at that time.

I approached Mr. Sontag as to whether or not he would be willing to invest in the Teller policy. When Mr. Sontag indicated he was willing to be an investor in the Teller policy, I provided him with an application which had been give to me by Yoel Epstein. This took place in Brooklyn, New York.

I had Mr. Sontag sign the application as the owner of the policy. I arranged for Mr. Sontag to pay the premiums. All of this occurred in Brooklyn, New York.


Some time thereafter, I obtained from Mr. Epstein a copy of the insurance policy on the life of Bluma Teller and I delivered it to Mr. Sontag in Brooklyn, New York.

None of these transactions occurred in New Jersey; everything occurred in New York.



David Weber

Sworn to before me this
25th day of January, 2011



Notary Public

ROCHELLE MEYER
Notary Public, State of New York
No. 4805065
Qualified in Rockland County
Commission Expires October 31, 2014